

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (READING)**

In re: Robert Joseph Kroboth and : Chapter 12  
Melanie Ann Kroboth :  
Debtors : Case 4:16-bk-13342

HEARING DATE:  
February 22, 2022 11:00 a.m.

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Fulton Bank, N.A, has filed a Motion to Dismiss for Failure to Make Plan Payments pursuant to 11 U.S.C. § 1208 with the Court.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before February 8, 2022 you or your attorney must do all of the following:

(a) file an answer explaining your position at:  
Clerk's Office  
United States Bankruptcy Court  
Eastern District of Pennsylvania  
The Gateway Building  
201 Penn Street, Suite 103  
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:  
Scott M. Klein, Esquire  
Brown McGarry Nimeroff LLC  
158 W. Gay Street, Suite 200  
West Chester, PA 19380  
[sklein@bmnlawyers.com](mailto:sklein@bmnlawyers.com)  
Tel.: 610-755-3311/Fax: 484-631-1302

(c) and a copy to the following:

David B. Schwartz, Esquire  
Goodman Schwartz  
514 Fullerton Avenue, Suite 2  
Whitehall, PA 18052  
610-434-2023  
[david@dbsesq.com](mailto:david@dbsesq.com)  
*Counsel for debtor*

Thomas I. Puleo, Esquire  
KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
(215) 627-1322  
(215) 627-7734 (fax)  
[tpuleo@kmlawgroup.com](mailto:tpuleo@kmlawgroup.com)  
*Counsel for United States of America, Acting through USDA,  
Commodity Credit Corporation*

Michael B. Joseph, Esquire  
824 Market Street, Suite 1002  
Wilmington, DE 19899  
(302) 656-0123  
[mjoseph@ch13de.com](mailto:mjoseph@ch13de.com)  
*Chapter 12 Trustee*

Office of the U.S. Trustee  
833 Chestnut Street  
Suite 500  
Philadelphia, PA 19107  
(215) 597-4411  
[USTPRegion03.PH.ECF@usdoj.gov](mailto:USTPRegion03.PH.ECF@usdoj.gov)  
*United States Trustee*

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on February 22, 2022 at 11:00 a.m. in United States Bankruptcy Court, Eastern District of Pennsylvania, The Gateway Building, 201 Penn Street, 4<sup>th</sup> Floor Courtroom, Reading, PA 19601. Unless the court

orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office at (610) 208-5040 to find out whether the hearing has been canceled because no one filed an answer.

**BROWN McGARRY NIMEROFF LLC**

Dated: January 24, 2022

By: */s/Scott M. Klein*

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